

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

In re:  IRMA A. RODRIGUEZ COSSIO  SSN #xxx-xx-5270  <i>Debtor</i>	Case No. 16-05295 EAG Chapter 7
---	------------------------------------

**DEBTOR SECOND REQUEST FOR SHORT EXTENSION OF TIME TO RESPOND &  
OPPOSE THIRD OBJECTION TO CLAIMED EXEMPTION**

---

TO THE HONORABLE COURT:

COMES NOW debtor herein through her legal representation and respectfully prays for additional time to oppose the Trustee's *Third Objection to Exemptions* filed at doc #120, for the reasons that follow:

1. On May 11, 2020 at doc #123, debtor requested and obtained an extension of time to oppose Trustee's *Third Objection to Exemptions* filed at doc #120 on April 28, 2020. The extended time allowed by this Court expires today, **June 11, 2020**.
2. Still suffering the effects of the emergency disaster pandemic lockdown, our remote work in drafting and research continues to be more difficult and even with the return to a hybrid of lockdown for attorneys, we cannot maintain our support staff's salaries as such and do not have back up to assist us and everything is double the effort.
3. Under these circumstances, debtor requests a second short extension of time of 14 days to complete and adequately and effectively address the *Third Objection to Claimed Exemption*, or on or before **June 25, 2020** to submit the *Response and Opposition* to Trustee's Objection.

WHEREFORE, debtor respectfully requests a short and additional extension of time to respond to Trustee's *Third Objection to Exemption* filed at doc #120, until at least, **June 25, 2020**.

**NOTICE**

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (I) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE of SERVICE that on this same date I electronically filed the foregoing with the Clerk of the Court using the CmEcf Filing System which will send a notification, upon information and belief, of such filing to the following:

ALEXANDRA BIGAS VALEDON on behalf of Defendant RAFAEL ANGEL RODRIGUEZ MOJICA [alexandra.bigas@gmail.com](mailto:alexandra.bigas@gmail.com), [alexandra.bigas@ecf.courtdrive.com](mailto:alexandra.bigas@ecf.courtdrive.com)

NOEMI LANDRAU RIVERA on behalf of Plaintiff NOREEN WISCOVITCH RENTAS [nlandrau@landraulaw.com](mailto:nlandrau@landraulaw.com), [paralegal@landraulaw.com](mailto:paralegal@landraulaw.com); [landraulaw@yahoo.com](mailto:landraulaw@yahoo.com); [assistant@landraulaw.com](mailto:assistant@landraulaw.com); [jlandrau@landraulaw.com](mailto:jlandrau@landraulaw.com)

MONSITA LECAROZ ARRIBAS [ustpregion21.hr.ecf@usdoj.gov](mailto:ustpregion21.hr.ecf@usdoj.gov)

MYRTA ESTRELLA NIEVES BLAS on behalf of Creditor Carlos Soto Villarrubia [estrellanievesblas@hotmail.com](mailto:estrellanievesblas@hotmail.com)

UNITED STATES TRUSTEE [ustpregion21.hr.ecf@usdoj.gov](mailto:ustpregion21.hr.ecf@usdoj.gov)

NOREEN WISCOVITCH RENTAS  
[courts@nwrlaw.com](mailto:courts@nwrlaw.com), [nwiscovitch@ecf.epiqsystems.com](mailto:nwiscovitch@ecf.epiqsystems.com); [nwr@trustesolutions.net](mailto:nwr@trustesolutions.net)

NOEMI LANDRAU RIVERA on behalf of Plaintiff NOREEN WISCOVITCH RENTAS [nlandrau@landraulaw.com](mailto:nlandrau@landraulaw.com), [paralegal@landraulaw.com](mailto:paralegal@landraulaw.com); [landraulaw@yahoo.com](mailto:landraulaw@yahoo.com); [assistant@landraulaw.com](mailto:assistant@landraulaw.com); [jlandrau@landraulaw.com](mailto:jlandrau@landraulaw.com)

In Caguas, Puerto Rico, this 11<sup>th</sup> day of June 2020.

*/s/ L.A. Morales*  
LYSSETTE MORALES VIDAL  
USDC PR #120011

L. A. MORALES & ASSOCIATES P.S.C.  
URB VILLA BLANCA  
76 AQUAMARINA  
CAGUAS, PUERTO RICO 00725-1908  
TEL 787-746-2434 / eFAX 855-298-2515  
Email [lamoraleslawoffice@gmail.com](mailto:lamoraleslawoffice@gmail.com) &  
[irma.lamorales@gmail.com](mailto:irma.lamorales@gmail.com)